

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
APR 6 11 52 AM '00
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS KINGSLEY TO INTERROGATORIES OF
VAL-PAK DEALERS' ASSOCIATION, INC., VAL-PAK DIRECT MARKETING
SYSTEMS, INC., AND CAROL WRIGHT PROMOTIONS, INC.
(VP-CW/USPS-T10-9-12)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of Val-Pak Dealers' Association, Inc., Val-Pak Direct Marketing Systems, Inc., and Carol Wright Promotions, Inc.:
VP-CW/USPS-T10-9-12, filed on March 23, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990 Fax -5402
April 6, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC., VAL-
PAK DEALERS' ASSOC., AND CAROL WRIGHT PROMOTIONS, INC.**

VP-CW/USPS-T10-9 Please refer to your response to NAA/USPS-T10-13.

a. Are detached address labels ("DALs") handled as letters or flats in city delivery?

b. Are DALs handled as letters or flats in rural delivery?

Response:

They are handled as letters in both rural and city delivery.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC., VAL-
PAK DEALERS' ASSOC., AND CAROL WRIGHT PROMOTIONS, INC.**

VP-CW/USPS-T10-10 Please refer to your testimony at page 9 (ll. 5-8). where you speak of delivery units and plants working together "to identify and capture Enhanced Carrier Route (ECR) letter bundles and trays to incorporate these pieces into the carriers' DPS mail, thus elimiiting the need for manual casing.

- a. Are DALs for saturation mailings included in this discussion of ECR letters?
- b. Are there efforts to eliminate manual casing of DALs?

Response:

- a. and b. Not to my knowledge. Please see response to VP-CW/USPS-T10-1.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC., VAL-
PAK DEALERS' ASSOC., AND CAROL WRIGHT PROMOTIONS, INC.**

VP-CW/USPS-T10-11

Please refer to your response to NAA/USPS-T10-14.

- a. Under what circumstances would a carrier not case DALs?
- b. In what percentage of DAL mailings are the DALs manually cased?
- c. In what percentage of DAL mailings are the associated mailpieces manually cased?
- d. Describe the different ways in which the associated saturation mailpiece could be handled, and how they vary by (i) whether the route is DPS, and (ii) DPS work method.

Response:

- a. On a mounted route. See my response to NAA/USPS-T10-16a.
- b. I am told that this information is not available.
- c. I am told that this information is not available.
- d. See my response to NAA/USPS-T10-16.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC., VAL-
PAK DEALERS' ASSOC., AND CAROL WRIGHT PROMOTIONS, INC.**

VP-CW/USPS-T10-12 Can ECR parcels in a DAL mailing qualify as automated flats, if between 0.75 and 1.25 inches thick?

Response:

No.

DECLARATION

I, Linda Kingsley, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Linda A. Kingsley

Date: 1-6-2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in dark ink, appearing to read "Susan M. Duchek", is written over a solid horizontal line.

Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990 Fax -5402
April 6, 2000